

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

EVDOKIA NIKOLOVA,
Plaintiff,

v.

UNIVERSITY OF TEXAS AT AUSTIN,
Defendant.

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Civil Action No.: 1:19-CV-00877

DEFENDANT’S EXHIBIT LIST

TO THE HONORABLE JUDGE PITMAN:

Rule CV-16(f) of the Court’s Local Rules instructs the parties to file “[a]n appropriate identification of each exhibit as specified in this rule (except those to be used for impeachment only), separately identifying those that the party expects to offer and those that the party may offer if the need arises.” LR CV-16(f)(4) (W.D. Tex.). In compliance with that rule, Defendant The University of Texas at Austin respectfully identifies the following exhibits:

DEF’S EX. #	DESCRIPTION	EXPECTS TO OFFER	MAY OFFER
1	HOP 2-2010. Academic Titles & Tenure	X	
2	HOP 2-2010. Extension of the Tenure Track Probationary Period	X	
3	HOP 2-2240. Modified Instructional Duties	X	
4	General Guidelines for Promotion & Tenure AY 2018–19	X	
5	Cockrell School of Engineering Dossier-Promotion Checklist	X	
6	2018–19 Evaluation Template P&T Committee		X
7	05/22/2013. Hiring committee emails		X
8	05/28/2013. Emails re hiring committee vote, extending offer		X
9	06/07/2013. Signed offer letter		X
10	10/08/2015. Nikolova’s MID memoranda	X	

DEF'S Ex. #	DESCRIPTION	EXPECTS TO OFFER	MAY OFFER
11	11/20/2015. Nikolova probationary extension docs	X	
12	11/20/2015. Letter approving probationary extension signed by Nikolova	X	
13	04/13/2018. Nikolova MID memoranda	X	
14	05/06/2018. Budget Council (first) vote on Nikolova promotion		X
15	05/31/2018. Nikolova's Revised Third-Year Review and transmission email		X
16	07/28/2018. Email thread regarding students, fiancé working on dossier (1)		X
17	08/02/2018. Email thread regarding students, fiancé working on dossier (2)		X
18	08/03/2018. Email thread regarding students, fiancé working on dossier (3)		X
19	09/10/2018. Budget Council (second) vote on Nikolova promotion		X
20	09/10/2018. Budget Council comments on Nikolova promotion		X
21	10/26/2018. Email thread re P&T Committee question (1)		X
22	10/26/2018. Email thread re P&T Committee question (2)		X
23	10/29/2018. Chair's letter in support of promoting Nikolova		X
24	11/14/2018. Email re P&T evaluation of Nikolova & evaluation		X
25	11/20/2018. Dean's Assessment of Nikolova	X	
26	Texts between Tewfik & Nikolova (Nov. 2018–March 2019)		X
27	03/01/2019. Email re unsolicited recommendation letter		X
28	03/25/2019. Nikolova letter to CCAFR		X
29	03/25/2019. Nikolova final argument letter to Fenves		X
30	03/26/2019. Nikolova email submitting final argument letter		X
31	03/26/2019. Nikolova email submitting CCAFR letter		X
32	04/24/2019. Reminder email regarding peer teaching evaluation	X	
33	04/25/2019. Emails reassigning Nikolova's peer teaching evaluation	X	

DEF'S Ex. #	DESCRIPTION	EXPECTS TO OFFER	MAY OFFER
34	05/07/2019. Email thread between Nikolova & Julien regarding teaching evaluation	X	
35	05/07/2019. Emails submitting teaching evaluation	X	
36	05/10/2019. Letter submitting EEOC Charge & Charge		X
37	05/13/2019. President's letter responding to CCAFR sub-committee letter		X
38	06/13/2019. EEOC's right-to-sue letter		X
39	09/05/2019. Emails regarding senior design supervision (1)	X	
40	09/06/2019. Emails regarding senior design supervision (2)	X	
41	09/06/2019. Emails regarding senior design supervision (3)	X	
42	09/06/2019. Emails regarding senior design supervision (4)	X	
43	09/16/2019. Nikolova's MID memoranda		X
44	09/20/2019. Nikolova's probationary extension docs		X
45	05/13/2020. Emails regarding missing FARs	X	
46	05/17/2020. Orshansky's rating for Nikolova	X	
47	05/17/2020. Caramanis's rating for Nikolova	X	
48	Nikolova's Tenure Dossier	X	
49	2019-20 ECE Faculty Annual Performance Rankings	X	
50	Expert Report of Donald R. Deere, Ph.D. (Dkt. #35-1)		X
51	15-16 Department Annual Review (UT Austin _0026196)	X	
52	16-17 Department Annual Review (UT Austin _0026197)	X	
53	17-18 Department Annual Review (UT Austin _0026198)	X	
54	18-19 Nikolova Annual Review (UT Austin _0026203)	X	
55	07/15/2013. Email regarding Nikolova's Offer Salary (UT Austin _0008200)		X
56	05/04/2016. Email 16-17 Merit Raises (UT Austin _0007343)		X
57	08/03/2017. Email regarding 17-18 Merit Raises (UT Austin _0017526)		X
58	08/03/2017. Email Attachment (UT Austin _0017528)		X
59	07/02/2018. Email 18-19 Merit Raises (UT Austin _0026425)		X
60	07/02/2018. Email Attachment (UT Austin _0026426)		X
61	06/14/2019. Email 19-20 Merit Raises (UT Austin _0026711)		X
62	Salary Spreadsheet ECE 2009-19 (UT Austin _0026708)	X	

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2022, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Benjamin L. Dower

BENJAMIN L. DOWER

Deputy Chief for General Litigation Division